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AO 106 (REV 4/10) Affidavit for Search Warrant

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JUN 7 2016

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Magistrate Judge Sidney I. Schenkier
United States District Court

In the Matter of the Search of:

Case Number: 16M301

The Pink iPhone S, Model a1687, FCC ID: BCG-E2944A and IC: 579C-E2944A more fully described in Attachment A, attached hereto.

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Helen Dunn, Special Agent of the Federal Bureau of Investigation, request a search warrant and state under penalty of perjury that I have reason to believe that on the following property or premises:

See Attachment A

located in the Northern District of Illinois, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, or contraband.

The search is related to a violation of:

Code Section	*Offense Description*
Title 18, United States Code, Section 1591	sex trafficking by force, fraud, or coercion

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

[signature]
Applicant's Signature

Helen Dunn, Special Agent, Federal Bureau of Investigation
Printed name and title

Sworn to before me and signed in my presence.

Date: June 7, 2016

[signature]
Judge's signature

City and State: Chicago, Illinois

SIDNEY SCHENKIER, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Special Agent Helen Dunn, being duly sworn, hereby depose and state that the following is true to the best of my information, knowledge and belief:

1. I am Special Agent with the Federal Bureau of Investigation. I have been so employed for approximately 13 years. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including sex trafficking in violation of 18 U.S.C. § 1591. I have participated in a number of criminal investigations, some of which involved the use of the Internet, email, and other social media to further criminal activity. I have participated in the execution of multiple federal search warrants as well.

2. This affidavit is made in support of 22 applications for warrants to search electronic devices.

a. This application seeks warrants for 19 devices that were seized on or about May 11, 2016, during the execution of a search warrant issued by a Magistrate Judge in the United States District Court for the District of Colorado on May 11, 2016, for the premises located at 801 S. Cherry Street, Apartment 435, Glendale, Colorado, 80246 (the "Biancofiori Apartment"). The government was previously granted a search warrant for the first 11 of those 19 devices by the court in Colorado, but law enforcement agents were unable to execute the search warrant within the two-week time frame allotted by the warrant. The remaining 8 of the 19 devices listed below were not included in the original warrant only because a complete inventory of recovered devices had not yet been completed and communicated to the affiant at the time that the original warrant was sought. Specifically, this application seeks warrants on the following devices, each of which were seized pursuant to a search of the Biancofiori Apartment:

i. one pink iPhone S, Model A1687, FCC ID: BCG-E2944A and IC: 579C-E2944A, with the home screen bearing a photograph of Victim D and BIANCOIFIORI, seized from the kitchen counter of the Biancofiori Apartment ("**Subject Device 1**");

ii. one gray MacBook Pro computer, Model A1278, serial number c1mkw02ydty3 ("**Subject Device 2**"), seized from underneath the mattress in the bedroom of the Biancofiori Apartment;

iii. one silver iPad, Model A1219, FCC ID: BCG-E2381A, IC: 579C-E2381A, serial number GB105A49Z39, seized from the living room corner of the Biancofiori Apartment ("**Subject Device 3**");

iv. one white Samsung LG Tablet, LG-LK430, FCC ID: ZNFLK430, MEID: 089 660 032 604 809 572, seized from the Biancofiori Apartment ("**Subject Device 4**");

v. one SIM card, AT&T 4488A O 4026, 89014104278774681821, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 5**");

vi. one SIM card, AT&T 4488A O 4026, 89014104278670703406, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 6**");

vii. one SIM card, AT&T 4488A O 4026, 89014104278468436060, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 7**");

viii. one SIM card, AT&T 4488A O 4026, 89014104278621646639, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 8**");

iv. one SIM card, AT&T 6007A G 3028, with the number partially obstructed but beginning in 8901 and ending in 1687, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 9**");

x. one SIM card, AT&T 4488A O 4026, 89014104278774680377, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 10**");

xi. one SIM card, Verizon, 89148000002343665714, seized from a yellow box in the living room in the Biancofiori Apartment ("**Subject Device 11**");

xii. one Toshiba external hard drive, serial number 62ULS3BBSSX4, seized from the Biancofiori Apartment ("**Subject Device 12**");

xiii. one silver-colored flash drive seized from the Biancofiori

Apartment ("**Subject Device 13**");

xiv. one black-colored flash drive seized from the Biancofiori Apartment ("**Subject Device 14**");

xv. one iPhone IMEI#: 355877065555403, seized from the Biancofiori Apartment ("**Subject Device 15**");

xvi. one iPhone IMEI#: 359233064569530, seized from the Biancofiori Apartment ("**Subject Device 16**");

xvii. one iPhone IMEI#: 359303064076503, seized from the Biancofiori Apartment ("**Subject Device 17**");

xviii. one iPad, serial number DLXM441JFLMK, seized from the Biancofiori Apartment ("**Subject Device 18**"); and

xix. one ZTE cell phone, model Z812, 322452680940, IMEI # 866737024900003 ("**Subject Device 19**") (collectively, the "**Subject Devices**").

b. This application also seeks a warrant to search a silver iPhone S in a black case, Model A1687, FCC ID: BCG-E2944A and IC: 579C-E2944A, which was recovered on the person of BIANCOFIORI at or around the time of his arrest on May 11, 2016[1] (the "**Subject Phone**");

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[1] The government did not seek a warrant for the **Subject Phone** at the time that it was recovered because law enforcement agents believed that the phone was password protected an unable to be accessed even with a search warrant. The government now seeks a warrant, believing there is a possibility that they will find alternative means to access the contents of the phone. No party has requested return of the **Subject Phone** to date.

c. Further, on or about May 18, 2016, a Magistrate Judge in the this Court, issued a seizure warrant for a 2013 Cadillac XTS, VIN 2G61V5S33D9215140, used by BIANCOFIORI and stored at a dealership in or around Denver, Colorado. When federal agents executed the seizure warrant and performed an inventory of the vehicle, they recovered an iPod, serial number CCQNK59MFMJG, model A1421 (the **Subject iPod**). This application seeks a warrant to search the **Subject iPod**.[2]

d. Finally, on or about May 11, 2016, federal agents executed a search warrant issued by a Magistrate Judge in this Court for the residence located at 1913 Golden Gate Lane, Naperville, Illinois (the "Biancofiori Residence"). During the search of the Biancofiori Residence, federal agents seized a Nikon digital camera, Serial Number 31102292 Cool Pix 5100 (the "**Subject Camera**").[3] This application seeks a warrant to search the **Subject Camera**.

3. All of the above-listed devices, including the devices recovered in Colorado, are currently located and stored in FBI custody at the FBI office 4343 Commerce Court, Suite 600, Lisle, Illinois, in a manner in which the contents are,

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[2] The government did not seek a search warrant for the **Subject iPod** on May 18, 2016, only because the **Subject iPod** was not in the custody of the FBI in Chicago, until on or around May 27, 2016, and the device was transported to the Lisle office on or about June 2, 2016. No party has requested return of the **Subject iPod** to date.

[3] The government did not seek a search warrant for the **Subject Camera** earlier because while the seizure of the camera was authorized by the warrant for the Biancofiori Residence (which included seizure of various items, including photographs associated with advertisements, surveillance cameras and video footage, and other photographs), agents discovered the possibility that the SIM card or other electronic storage device is present in the camera and therefore are seeking the instant warrant in an abundance of caution. No party has requested the return **Subject Camera** to date.

in my experience and to the extent material to this investigation, in substantially the same state as they were when the devices first came into the possession of the FBI.

4. This affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers, interviews of witnesses, cellular phone records, consensually recorded conversations, and records obtained from multiple sources, including social media outlets. Because this affidavit is being submitted for the limited purpose of establishing probable cause that evidence, instrumentalities, and contraband related to this criminal conduct will be found on the **Subject Devices**, the **Subject Phone**, the **Subject iPod**, and the **Subject Camera**, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to search the **Subject Devices**, the **Subject Phone**, the **Subject iPod**, and the **Subject Camera**.

5. The applied-for warrants would authorize investigators to complete a forensic examination of the **Subject Devices**, the **Subject Phone**, the **Subject iPod**, and the **Subject Camera** identified in Attachment A for the purpose of identifying electronically stored data particularly described in Attachment B. Based on the information set forth below, there is probable cause to believe that BIANCOFIORI has engaged in sex trafficking by force, fraud, and coercion, in violation of 18 U.S.C. § 1591, and that evidence, instrumentalities, and contraband

related to this criminal conduct, as further described in Attachment B, will be found in the **Subject Devices** and the **Subject Camera**.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

6. Based on my training and experience, I know the following about cellular phones, digital cameras, SIM cards, and digital storage devices.

7. Most cellular telephones are equipped with a digital camera. A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable digital storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media includes various types of flash memory cards and miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos such as texts, word processing documents, or web pages. If the camera is equipped with global positioning system ("GPS") technology, that information may be recorded as metadata associated with the photographs and videos taken with that camera as well as other information such as the make and model of the camera and the date and time the image was created. Some cameras and removable storage media are now equipped with wireless capabilities, which allow for images and files to be

uploaded from the camera or digital storage media directly to the Internet or to other digital storage devices or computers using a wired or wireless connection.

8. A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional "land line" telephones. A wireless telephone usually contains a "call log," which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic "address books;" sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet including websites, social media sites, bulletin boards, file sharing, and other Internet sites. Wireless telephones often have a subscriber identity module or subscriber identification module ("SIM"), which is an integrated circuit that securely stores the International Mobile Subscriber Identity ("IMSI") and the related key used to identify and authenticate subscribers on mobile telephone devices. A SIM is embedded into a removable "SIM card," which can be transferred between different mobile devices. A SIM card contains a unique serial number

("ICCID"), IMSI, security authentication and ciphering information, temporary information related to the local network, a list of the services to which the user has access, and certain passwords. Most SIM cards will also store certain usage data, such as call history, text ("SMS") messages, and phone book contacts. Wireless telephones may also be "smartphones," such that they operate as personal computers capable of accessing the Internet. They may also include GPS technology for determining the location of the device. Such telephones may also contain removable storage media, such as a flash card—such devices can store any digital data, and can have the capacity to store many gigabytes of data. Some cellular telephones also have software, giving them the same capabilities as personal computers including accessing and editing word processing documents, spreadsheets, and presentations. Some cellular telephones also operate as a "tablet," or mobile computer, and can contain software programs called applications or "apps." Apps, like programs on a personal computer, perform different functions and save data associated with those functions. Apps can, for example, permit accessing the Web, sending and receiving e-mail, and participating in Internet social networks. Those programs can perform different functions and save data associated with those functions, including use associated with the Internet.

9. A GPS navigation device uses the Global Positioning System to display its current location. It often contains records of the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to

another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

10. Digital storage devices can include all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, laptop computers, mobile phones, pagers, tablets, server computers, game consoles, and network hardware and also includes any physical object upon which computer data can be recorded such as hard disk drives, RAM, floppy disks, flash memory, CDs, DVDs, and other magnetic or optical media.

11. Based on my knowledge, training, and experience, I know that digital storage devices can store information for long periods of time. Similarly, things that have been searched for and viewed via the Internet are typically stored for some

period of time on a device. This information can sometimes be recovered with forensic tools.

12. Based on my knowledge, training, and experience, examining data stored on cellular telephones or digital storage devices can uncover, among other things, evidence that reveals or suggests who possessed or used the devices.

13. There is probable cause to believe that things that were once stored on the devices may still be stored there, for at least the following reasons:

a. Based on my knowledge, training, and experience, I know that digital files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person "deletes" a file on a digital storage device or computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer's operating system may also keep a record of deleted data in a "swap" or "recovery" file.

c. Wholly apart from user-generated files, digital storage devices can contain electronic evidence of how a digital storage device has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory "swap" or paging files. Digital storage devices users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.

d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or "cache." Forensic review may also disclose when and by whom the Internet was used to conduct searches, view material, and communicate with others via the Internet.

14. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information on the devices that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the devices were used, the purpose of the use, who used the devices, and when. There is probable cause to believe that this forensic electronic evidence might be on the devices because:

a. Data on the storage medium can provide evidence of a file that was once on the storage media but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer or device was in use. Digital storage devices' file systems can record information about the dates files were created and the sequence in which they were created. This information can be recovered months or even years after they have been downloaded onto the storage medium, deleted, or viewed.

b. Forensic evidence on a device can also indicate who has used or controlled the device. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence.

c. A person with appropriate familiarity with how a digital storage device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.

d. The process of identifying the exact electronically stored information on storage media that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a digital storage device is evidence may depend on other information stored on the digital storage device and the application of knowledge about how a computer or digital storage device behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

f. Based on my training and experience, I know that when an individual uses an electronic device to aid in the commission of a crime, particularly the crime of sex trafficking by force, fraud, or coercion, the individual's electronic device will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The electronic device is an instrumentality of the crime because it is used as a means of committing the criminal offense. The electronic device is also likely to be a storage medium for evidence of crime. More specifically, and based on my training and experience, I believe that an electronic device used to commit a sex-trafficking crime may contain: calls and voicemails regarding scheduling appointments for commercial sex services; text messages between a person engaging in commercial sex services and the clients or pimp who may be responsible for transporting that individual;

GPS searches and information associated with traveling in order to engage in commercial sex trafficking; internet searches pertaining to commercial sex trafficking; photographs and/or videos of women who engage in commercial sex services, which are used for advertisements or for other purposes related to the commercial sex industry; social media apps such as Facebook or Instagram, where the phone owner may be communicating with others regarding commercial sex trafficking; email accounts with emails containing communications related to commercial sex work. Additionally, devices are often used to call, text, send photos and email information to criminal associates or victims before, during, and after crimes to assist in the crimes both in planning, executing, and fleeing from the crime scene, and that information is likely contained in the memory of the cell phone. In addition, people who engage in commercial sex trafficking are likely to communicate using texts, email, or by phone to arrange for commercial sex services or appointments.

g. I also know that those who engage in criminal activity will attempt to conceal evidence of the activity by hiding files, by renaming the format, (such as saving a .pdf image file as a .doc document file) or by giving them deceptive names such that it is necessary to view the contents of each file to determine what it contains.

FACTS SUPPORTING PROBABLE CAUSE

I. Background and Summary of the Investigation

15. Beginning in or around February 2016, the FBI began investigating allegations that BENJAMIN BIANCOFIORI and others were engaging in the sex trafficking of women in the Chicago area and elsewhere by force, fraud, and coercion. The investigation has shown that BIANCOFIORI is a pimp who, between 2007 and the present, has trafficked numerous adult women, including Victim A, Victim B, Victim C, Victim D, Victim E, and other women known and unknown, by force, fraud, and coercion. At times, BIANCOFIORI recruited women to engage in commercial sex acts on his behalf using the messaging service available through his Facebook account, which contained the user name "Ben Beanz Biancofiori" and the URL address http://www.facebook.com/ben.biancofiori (the "Biancofiori Facebook Account").[4] [5]

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[4] Law enforcement has identified BIANCOFIORI as the user of the Biancofiori Facebook Account in several ways. First, the Biancofiori Facebook Account user name, "Ben Beanz Biancofiori," is consistent with BIANCOFIORI's true name. Moreover, according to Victim A and Victim B, BIANCOFIORI is often referred to, and refers to himself, by the nickname "Beanz." Additionally, as discussed below (*see* paragraph 46), Victim C provided law enforcement with copies of messages that she exchanged with BIANCOFIORI on or about November 10, 2015, using Facebook's messaging service. In those messages, BIANCOFIORI used the Biancofiori Facebook Account and told Victim C that "[t]hey call me Beanz." Victim A also identified the Biancofiori Facebook Account as being an account she knows to be used by BIANCOFIORI. In addition, beginning no later than February 2016 and continuing to approximately early April 2016, the Biancofiori Facebook Account could be viewed in its entirety by any member of the public who maintains a Facebook account, including law enforcement. I have reviewed a number of photographs posted on the Biancofiori Facebook Account and, having previously reviewed a known photograph of BIANCOFIORI, recognize him in the numerous photographs which appear to be posted by the user of the account.

16. As explained below, the investigation has also shown that BIANCOFIORI advertised the women who engaged in commercial sex acts on his behalf in online commercial sex advertisements on the websites Craigslist.com and Backpage.com, and that each of the Backpage.com advertisements linked to the email address eliteivy74@gmail.com (the "Gmail Account").[6] At times, BIANCOFIORI rented and caused to be rented hotel rooms where the women engaged in commercial sex acts on his behalf; later, BIANCOFIORI and others, sometimes including three adult males, Individual A, Individual B, and Individual C, drove the women to locations where they engaged in commercial sex acts with

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On or about May 11, 2016, BIANCOFIORI was arrested and provided with his *Miranda* rights. BIANCOFIORI waived those rights and agreed to participate in an interview with law enforcement officers. During that interview, and as described in more detail in Footnote 36, below, among other things, BIANCOFIORI denied any involvement in commercial sex trafficking, but admitted that he maintained both a Facebook and an Instagram account.

[5] On or about February 18, 2016, pursuant to 18 U.S.C. § 2703(f), the FBI requested the preservation for a period of 90 days of all stored communications, records, and other evidence in Facebook's possession regarding the Biancofiori Facebook Account. Since the date of the preservation letter, BIANCOFIORI has deleted certain Facebook posts from public view, and also, on or about early April 2016, made portion of his Facebook account private.

[6] BIANCOFIORI is believed to be a user of the Gmail Account, which according to Google was created on or about May 14, 2015. First, as described below (*see* paragraph 38), BIANCOFIORI told Victim B that he needed to be the one to post the commercial sex advertisements on Backpage.com, and according to both Victim B and Victim C, BIANCOFIORI posted photographs of both women on Backpage.com in advertisements for commercial sex. Documents provided by Backpage.com confirm that such postings were made (*see*, *e.g.*, paragraph 50, below), often from Naperville, Illinois, where BIANCOFIORI's residence (the Biancofiori Residence) is located. Also, records provided by Google reflect that the subscriber name tied to the Gmail Account is "Ivy Soprano." Based upon my training and experience, and the investigation to date, I believe that "Ivy Soprano" is a false name used by BIANCOFIORI and his associates to conceal the true identity of the user of the Gmail Account in an effort to evade law enforcement.

customers. BIANCOFIORI then kept the vast majority of the proceeds earned by the women.

17. As explained below, the investigation has further revealed that, beginning no later than January 2016 and continuing until approximately March 2016, BIANCOFIORI ran his sex-trafficking business primarily out of a townhouse located at 1913 Golden Gate, Naperville, Illinois (the "Biancofiori Residence"). At the Biancofiori Residence, BIANCOFIORI posted online commercial sex advertisements, stored items related to his sex-trafficking business, including vehicles and drugs, obtained and stored proceeds earned from his victims' commercial sex acts, and physically abused the women who engaged in commercial sex acts on his behalf.

18. Further, during the course of the investigation, the FBI conducted separate interviews of several women who engaged in commercial sex acts for BIANCOFIORI between approximately 2007 and March 2016, including Victim A, Victim B, and Victim C. As described in more detail below, BIANCOFIORI physically abused and caused others to physically abuse Victim A, Victim B, Victim C, Victim D, Victim E, and other women known and unknown, all of whom engaged in commercial sex acts on behalf of BIANCOFIORI, including by punching and beating the women. BIANCOFIORI sometimes beat the women with such force that he caused lacerations, bruising, swelling, blood loss, and injuries that necessitated

medical attention. At times, BIANCOFIORI used plastic-adorned fingerless boxing gloves to beat one woman, Victim D.

19. As explained below, in approximately April 2016, BIANCOFIORI learned of the federal grand jury investigation inquiring into allegations that BIANCOFIORI engaged in sex trafficking through the use of force, fraud, and coercion. The investigation has further shown, in part through social media postings BIANCOFIORI has made using the Biancofiori Facebook Account and BIANCOFIORI's Instagram account (the "Biancofiori Instagram Account"),[7] [8] that

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[7] Law enforcement has identified BIANCOFIORI as the user of the Biancofiori Instagram Account in the following ways. First, the Biancofiori Instagram Account has used two user names, "ILLSTATESFINEST74" (including on April 5, 2016) and "CADILLACPIMPIN74" (including on March 28, 2016) and is linked to the name, "Ben Biancofiori." The user names "ILLSTATESFINEST74" and "CADILLACPIMPIN74" are consistent with identifiers used by BIANCOFIORI on another occasion, namely by including "ILLSTATES FINEST" and the number "74." BIANCOFIORI has incorporated the number 74 into the Gmail Account (eliteivy74@gmail.com), and numerous posts on the Biancofiori Facebook Account contain a hashtag followed by the words "illstatesfinest." For example, the following posting was placed on the Biancofiori Facebook Account on April 8, 2016, which law enforcement believes was directed at personnel assigned to the instant investigation:

Ben Beanz Biancofiori feeling determined.
2 hrs

Just thought I would start my day off by telling the ppl who have to be beyond frustrated with me by now... I hope your weekend is half as good as my week has been. Nothing is free, Im going to make u earn your little paychecks. #illstatesfinest # gleamteamgeneral #chessnotcheckers

Also, the Biancofiori Facebook Account appears to be linked to the Biancofiori Instagram Account, as there are times that a post appears on the Biancofiori Facebook Account with a reference to Instagram written next to the date of the post. In addition, beginning no later than approximately February 2016 and continuing to approximately early April 2016, the Biancofiori Instagram Account could be viewed by any member of the public, including law enforcement. Consequently, I and other law enforcement officers have since approximately mid-March 2016, BIANCOFIORI has been traveling in the western United States, at times with Victim D and Victim E. The investigation has further shown that BIANCOFIORI posted Victim E in online commercial sex advertisements using Backpage.com and the Gmail Account since mid-March 2016 in Phoenix, Arizona, and Denver, Colorado, most recently on or about May 10, 2016 in Denver, Colorado.

20. Further, on or about May 11, 2016, BIANCOFIORI was arrested in the apartment complex known as the Solana Cherry Creek Luxury Apartments in Glendale, Colorado, pursuant to an arrest warrant issued out of this Court. That same day, law enforcement also executed a search warrant issued out of the District of Colorado for BIANCOFIORI's apartment at that complex, namely the apartment located at 801 S. Cherry Street, Apartment 435, Glendale, Colorado, 80246 (the "Biancofiori Apartment"). During the execution of that search warrant, law enforcement seized among other things the **Subject Devices**, which are believed to contain evidence of BIANCOFIORI and others' criminal activity.

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reviewed a number of publicly available photographs posted on the Biancofiori Instagram Account and, having previously reviewed a known photograph of BIANCOFIORI, recognized him in numerous photographs that appear to be posted by the user of the account.

[8] On or about February 18, 2016, pursuant to 18 U.S.C. § 2703(f), the FBI requested the preservation for a period of 90 days of all stored communications, records, and other evidence in Instagram's possession regarding the Biancofiori Instagram Account. Since the date of the preservation letter, BIANCOFIORI has deleted certain Instagram posts from view, and also, in early April 2016, made his Instagram account private.

21. On the same date, on or about May 11, 2016, searches were conducted of BIANCOFIORI's person and of the Biancofiori Residence in this District. The search of the Biancofiori Residence was pursuant to a search warrant issued in this district.

22. On or about May 19, 2016, a search was conducted of a vehicle used by BIANCOFIORI and stored at a dealership in Colorado. The search of that vehicle was pursuant to a seizure warrant issued in this district.

II. Biancofiori's Use of Force, Fraud, and Coercion Against Five Victims Who Engaged in Commercial Sex Acts on his Behalf

23. During the course of the investigation, Victim A, Victim B, and Victim C provided the following information about themselves and other women, including Victim D and Victim E, all of whom were subjected to force, fraud, and coercion by BIANCOFIORI and others who financially benefitted from commercial sex acts engaged in by the victims.

A. Victim A[9]

9 Based on a review of law enforcement databases, Victim A has approximately nine convictions and 17 arrests, including convictions for the following offenses: battery, prostitution, attempting to obstruct justice, possession of cannabis, possession of drug paraphernalia, theft, and driving under the influence of alcohol. Victim A recently has been arrested and charged with a violent offense, and is cooperating in part with the hope that she will receive consideration in connection with her pending charges. In addition, according to Victim A, during her relationship with BIANCOFIORI, Victim A has at times reported false information to law enforcement regarding BIANCOFIORI. For example, Victim A filed a false police report at BIANCOFIORI's direction in order to conceal the fact that BIANCOFIORI battered Victim A and directed her kidnapping. In addition, Victim A also reported that during the course of her relationship with BIANCOFIORI, Victim A lied to a healthcare provider at a medical facility in order to conceal the fact that BIANCOFIORI was the source of her injuries. Information provided by Victim A regarding

24. According to Victim A, who was born in 1986, she engaged in commercial sex acts on behalf of BIANCOFIORI from approximately 2007 until 2012.[10] During that time, BIANCOFIORI subjected Victim A to force, fraud, and coercion in order to cause Victim A to engage in commercial sex acts, from which BIANCOFIORI financially benefitted.

25. More specifically, according to Victim A, Victim A and BIANCOFIORI began a romantic relationship in 2005, which continued on and off until approximately early 2016. In approximately 2007, an unidentified male proposed to Victim A that she engage in sexual activity with him in exchange for money. Victim A agreed to the proposal, and informed BIANCOFIORI of the proposal. BIANCOFIORI agreed to go with Victim A to the meeting in exchange for half of the money earned by Victim A. Victim A engaged in a commercial sex act and split the proceeds earned with BIANCOFIORI.

26. According to Victim A, a short time later, BIANCOFIORI began pressuring Victim A to engage in commercial sex acts for money. BIANCOFIORI told Victim A that they would be a "team" and "partners," and that he would post pictures of Victim A in online advertisements. Eventually, Victim A agreed to BIANCOFIORI's proposal. BIANCOFIORI and another individual took photographs of Victim A, and used the photos in online advertisements on Craigslist.com.

BIANCOFIORI has been corroborated by other sources, including other witness testimony and documentary evidence.

[10] During the course of the investigation, law enforcement showed Victim A a known photograph of BIANCOFIORI, which Victim A identified as BIANCOFIORI.

27. Victim A observed BIANCOFIORI place the advertisements online while they were in hotel rooms in the western suburbs of Chicago, including the Hyatt, Comfort Inn, and Extended Stay in Lisle, Illinois, and Downers Grove, Illinois. After the advertisements were posted, customers responded to the ads, and the customers came to the hotel rooms to engage in sex acts with Victim A in exchange for money. While Victim A engaged in commercial sex acts, BIANCOFIORI waited in a vehicle or in an adjoining hotel room. In her first month of working with BIANCOFIORI in the commercial sex business, Victim A engaged in commercial sex acts almost every day and made approximately $40,000, which Victim A split with BIANCOFIORI.

28. According to Victim A, after a few weeks or months, Victim A told BIANCOFIORI that she no longer wanted to engage in commercial sex acts. BIANCOFIORI pressured Victim A to continue. BIANCOFIORI became physically aggressive toward Victim A, tried to stop her from leaving him, and threatened her and her family. For example, on one occasion, as Victim A attempted to return to a hotel room to collect her belongings and leave BIANCOFIORI, BIANCOFIORI followed Victim A to the hotel, and approached her from behind and punched her, which caused the front of Victim A's head to hit the hotel room door. BIANCOFIORI and Victim A then entered the hotel room, and Victim A felt that she could not leave the room without BIANCOFIORI physically harming her.

29. Victim A stated that BIANCOFIORI continued to hit or beat Victim A at least once a week on average, but there were times when BIANCOFIORI beat Victim A for several days straight. BIANCOFIORI beat Victim A with objects and with his hands, causing Victim A's body to bruise and swell. At times BIANCOFIORI withheld food or sleep from Victim A. BIANCOFIORI caused injuries to Victim A such that she sought medical attention at hospitals within the Chicagoland area. According to Victim A, because of BIANCOFIORI's persistence, threats, and physical beatings, Victim A did not believe she could leave and stop engaging in commercial sex acts on behalf of BIANCOFIORI.

30. According to Victim A, beginning in approximately 2007, another woman began working for BIANCOFIORI by engaging in commercial sex acts, and additional women began working for him beginning in approximately 2008. Victim A stated that as a result, Victim A spent less time engaging in commercial sex acts for BIANCOFIORI, and instead took calls from customers, scheduled appointments, and along with BIANCOFIORI, drove the women to appointments. According to Victim A, while the women engaged in commercial sex acts for BIANCOFIORI, he had them work almost every night, though women came and went. To Victim A's knowledge, BIANCOFIORI did not pay these women, but he fed them at times, gave them small amounts of money for essential items, and provided them with drugs, including heroin.

31. Victim A saw BIANCOFIORI beat the women who engaged in commercial sex acts on his behalf, and also had others beat the women. Victim A stated that on a couple of occasions, BIANCOFIORI ordered Victim A to hit the women, and Victim A did so because she was afraid that if she refused to follow BIANCOFIORI's order, he would instead beat Victim A. Victim A stated that BIANCOFIORI beat two women who worked for him even after he instructed Victim A to beat the women. According to Victim A, after the beatings, the women continued to engage in commercial sex acts on behalf of BIANCOFIORI.

32. Victim A stated that other individuals assisted BIANCOFIORI with his business at times, including Individual B.[11] According to Victim A, Individual B "babysat" some of the women while they worked, including by staying with the women at hotels. Victim A also stated that Individual B at times drove the women to their appointments with customers.

33. According to Victim A, she tried to leave BIANCOFIORI multiple times without success. On one occasion, Victim A ran away to a shelter. According to Victim A, after BIANCOFIORI convinced Victim A to return to him, BIANCOFIORI beat Victim A and it took four weeks for Victim A's body to heal. On another occasion, Victim A ran away from BIANCOFIORI; according to Victim A, BIANCOFIORI learned of Victim A's whereabouts and arranged for two of his associates, Individual D and Individual E, to kidnap Victim A at gunpoint and

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[11] During the course of the investigation, Victim A was shown a known photograph of Individual B, and she identified Individual B by name.

return Victim A to BIANCOFIORI.[12] According to Victim A, Individual D and Individual E[13] put Victim A in a vehicle in order to return her to BIANCOFIORI.

34. Following Victim A's unsuccessful attempts to leave BIANCOFIORI, Victim A at times engaged in commercial sex acts on behalf of BIANCOFIORI, primarily when BIANCOFIORI and Victim A traveled out of state. Victim A stated that in approximately 2010, BIANCOFIORI posted Victim A in online classified advertisements for commercial sex while they traveled to Atlanta, Georgia, Tampa, Florida, and he did so again in approximately 2012, when they traveled to Atlantic City, New Jersey. In approximately August 2012, Victim A stopped working for BIANCOFIORI and moved to another state.

35. According to Victim A, since ceasing to work for BIANCOFIORI in 2012, Victim A has at times lived with BIANCOFIORI and maintained a romantic relationship, and has continued to communicate with BIANCOFIORI. Through those communications with BIANCOFIORI and with others, Victim A learned of other women, including Victim D, associated with BIANCOFIORI's sex trafficking business.

B. Victim B[14]

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[12] According to Victim B, BIANCOFIORI has previously admitted to Victim B that he arranged the kidnapping of another woman with the same first name as Victim A. *See* paragraph 43, below.

[13] During the course of the investigation, Victim A identified Individual D and Individual E as adult males and by name.

[14] Based on a review of the law enforcement databases, Victim B has no arrests and no convictions. The information provided by Victim B during the course of this investigation

36. According to Victim B, who was born in 1993, she engaged in commercial sex acts on behalf of BIANCOFIORI from approximately January 2016 until March 2016.[15] During that time, BIANCOFIORI subjected Victim B to force, fraud, and coercion in order to cause Victim B to engage in commercial sex acts from which BIANCOFIORI and others financially benefitted.

37. More specifically, Victim B stated that she first met BIANCOFIORI in approximately December 2015 at the Biancofiori Residence through her friend, Victim E, who at the time engaged in commercial sex acts on behalf of BIANCOFIORI.[16] BIANCOFIORI told Victim B that he was a pimp, that he wanted Victim B to work for him, and that she would be paid approximately 40% of the revenue she brought in, with the rest of the money to be divided between him and his "team," which BIANCOFIORI explained included others who helped him with his sex trafficking business. Based on this information from BIANCOFIORI, Victim B agreed to engage in commercial sex acts on behalf of BIANCOFIORI and began working for BIANCOFIORI the following day.

38. According to Victim B, when she arrived at the Biancofiori Residence the following day, Victim D and Victim E were present and took pictures of Victim

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has been corroborated by other evidence, including other witnesses and documentary evidence.

15 During the course of the investigation, law enforcement showed Victim B a known photograph of BIANCOFIORI, which Victim B identified as BIANCOFIORI.

16 More information about Victim E is contained in paragraphs 59-63, below.

B.[17] BIANCOFIORI then posted the photographs in online advertisements on Backpage.com.[18] BIANCOFIORI told Victim B that he needed to be the one to post the photos because he was the only one who knew how to do it the correct way. Victim B was advertised under the working name, "Tiffany."

39. During the course of this investigation, Backpage.com provided copies of advertisements associated with the email address "eliteivy74@gmail.com" (the "Gmail account") for the period of time between on or about October 23, 2015, and May 6, 2016. These advertisements were posted in multiple cities' "adult entertainment, escort" section, each linked to the Gmail account. I have reviewed these advertisements, and saw that between on or about January 7, 2016, and on or about March 13, 2016, Victim B's semi-nude photograph appeared in online commercial sex advertisements for the Chicagoland area, each time advertising her services with the name "Tiffany."

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17 During the course of the investigation, Victim B has reviewed known photographs of Victim D, Victim E, Individual A, Individual B, and Individual C and identified them by their names. Victim B identified Individual A, Individual B, and Individual C as the people who at times drove her to appointments.

18 Based on my training and experience, I understand that Backpage.com is a website that allows users to post advertisements for goods and services, including adult escort services. An individual who wants to post an ad on Backpage.com may set up an account with Backpage.com, and the individual must provide Backpage.com with an email address and password. Once an account is set up, a user can place ads for services. A representative from Backpage.com has confirmed that Backpage.com does not have any facilities, services, or offices in the State of Illinois. Also, according to Backpage.com, the volume of advertisements described in this Affidavit does not include the re-posting of an advertisement. Based upon the records provided by Backpage.com, Backpage.com advertisements posted using the Gmail Account have been re-posted on multiple occasions.

40. Victim B said that after the online advertisements were placed on Backpage.com, clients made appointments by calling the phone number posted in the advertisement. Victim B stated that Victim D took the client calls and scheduled the appointments.

41. According to Victim B, in the beginning, she was driven to appointments by Individual A or Individual B, both of whom knew that Victim B's appointments were for commercial sex acts and who received a portion of the proceeds Victim B earned from engaging in commercial sex acts. At other times, Victim E or Individual C, another associate of BIANCOFIORI, drove her to appointments, or Victim B drove herself. Victim B's commercial sex appointments were for "outcalls" only, meaning that the appointments occurred at a location of the customer's choosing.

42. According to Victim B, BIANCOFIORI required Victim B to be at the Biancofiori Residence, ready to engage in commercial sex acts, by 7 p.m. every evening. Victim B stated that, on average, she made approximately $1500-$2000 a day by engaging in commercial sex acts, and on a slow day she made no less than $550. On a slow day, she performed two outcalls. When she arrived at an outcall, Victim B obtained the money from the customer first, and then texted Victim D, "AG," meaning "all good." After the appointments, according to Victim B, all of the

money earned was provided to BIANCOFIORI, who controlled the money and on occasion provided Victim B with limited spending money.[19]

43. Victim B stated that, while working for BIANCOFIORI, Victim B was afraid to leave BIANCOFIORI, even though BIANCOFIORI told Victim B that she could leave. According to Victim B, BIANCOFIORI told her about what happened to other women who tried to leave, including one woman who attempted to leave BIANCOFIORI several times. Victim B stated that BIANCOFIORI told Victim B that he sent people to kidnap the woman, who he identified to Victim B only by first name, and put her in the trunk of a car.[20]

44. According to Victim B, BIANCOFIORI intimidated her by physically beating other women in her presence, including Victim C, Victim D, and Victim E (*see e.g.*, paragraphs 52, 58, and 62, below). On one occasion, BIANCOFIORI ordered Victim D and Victim E to beat up Victim B at the Biancofiori Residence. Victims D and E complied with the order. Shortly thereafter, BIANCOFIORI beat

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[19] Other evidence obtained during the course of the investigation is consistent with Victim B's statement that BIANCOFIORI kept the majority of the money earned by Victim B and other women engaged in commercial sex. For example, on or about March 28, 2016, a 14-second video was posted to the Biancofiori Instagram Account and the Biancofiori Facebook Account. The video depicts a person dropping numerous $100 bills on the floor while rap music plays in the background. Based upon the investigation to date, including information obtained from documents reflecting that BIANCOFIORI has no known legitimate source of income, I believe that the money found in the video constitutes proceeds of BIANCOFIORI's illegal activities.

[20] The first name BIANCOFIORI told Victim B is also the same first name of Victim A, who has told law enforcement that BIANCOFIORI had two associates kidnap her and return her to BIANCOFIORI (*see* paragraph 33, above). Based upon this information and information provided by Victim A, I believe that the person BIANCOFIORI admitted to Victim B to kidnapping was Victim A.

Victim D. In approximately March 2016, Victim B ran away from BIANCOFIORI and not worked for him since.

C. Victim C[21]

45. According to Victim B and Victim C, Victim C, born in 1997, engaged in commercial sex acts on behalf of BIANCOFIORI in or about February 2016.[22] During that time, BIANCOFIORI subjected Victim C to force, fraud, and coercion in order to cause Victim C to engage in commercial sex acts from which BIANCOFIORI financially benefitted.

46. More specifically, Victim C stated that she met BIANCOFIORI through Facebook in the fall of 2015 through a mutual friend. According to Victim C, BIANCOFIORI began sending Victim C messages through Facebook and

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[21] Based on a review of the law enforcement databases, Victim C has five arrests and no convictions. Victim C has recently been charged with possessing drugs and is cooperating with law enforcement in part with the hope that she will receive consideration in connection with that pending charge. Victim C explained to law enforcement that during the relevant time period, she was drinking alcohol often and was taking Xanax. She stated that she does not now recall all of the specific details of the events around this time period, but she stated that she did recall several details, including those included within this affidavit. Victim C has previously provided reliable information to law enforcement in connection with another sex trafficking investigation, and the information provided by Victim C in this investigation has been corroborated by other sources, including other witnesses, audio recordings, and documentary evidence.

[22] During the course of the investigation, Victim C showed law enforcement a photograph of BIANCOFIORI, which Victim C identified as BIANCOFIORI. Further, Victim B was previously shown a known photograph of Victim C and identified her by a variation of her first name, as a woman who engaged in commercial sex acts on behalf of BIANCOFIORI, and as a victim of physical abuse by BIANCOFIORI. Victim C has also reviewed known photographs of Victim B, Victim D, and Victim E, and identified them by first, and sometimes last, name, and as individuals who engaged in commercial sex acts on behalf of BIANCOFIORI.

proposed that Victim C work for BIANCOFIORI's commercial sex business. Later, Victim C provided law enforcement with screenshots of messages that she exchanged with BIANCOFIORI, which contained the following Facebook message posted using the Biancofiori Facebook Account:

> Hey Beautiful . . . my lil bro knows u, tat man. He told me ur 1000. We should talk ppr sometime. Make ur next move ur best move.
>
> *****
>
> Just getting up. Text me 847-284-XXXX [Biancofiori Phone 1]. They call me Beanz. I own the escort service bro mentioned to u.[23]

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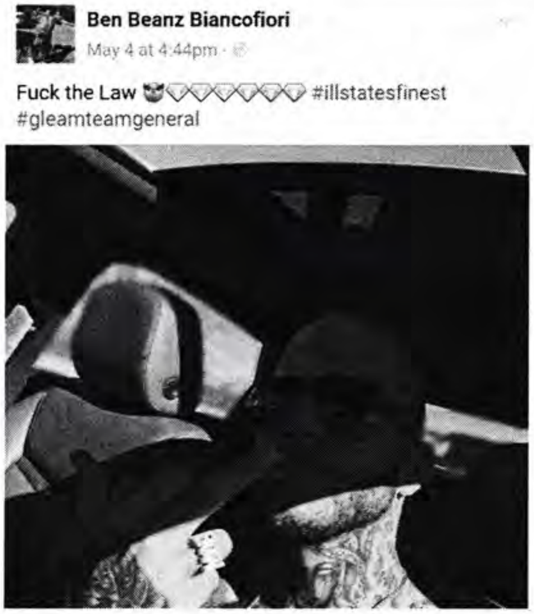
[23] Based on the investigation to date, I believe that BIANCOFIORI uses the term "Gleam Team" to describe the women that engage in commercial sex acts for his financial benefit and associates of BIANCOFIORI who further his illegal business, and that he uses the term "Gleam Team General" to refer to himself. More specifically, and for example, during the investigation, Victim C identified a February 10, 2016, photograph of Biancofiori, Victim C, Victim D, Victim E, and another woman, which was posted on the Biancofiori Facebook Account with the title, "Gleam Team." Also, on or about February 28, 2016, a photograph of Biancofiori, Victim B, Victim D, Victim E, and two other individuals was posted on the Biancofiori Facebook Account with the hashtag, among others, of "#gleamteam." Further, the Biancofiori Facebook account "tags," or links, to what appear to be the Facebook accounts of Victim D and Victim E. Further, Victim B reviewed the February 28, 2016 photograph and identified herself and the other persons in the photograph, including BIANCOFIORI, Victim D, and Victim E. In addition, on or about May 4, 2016, BIANCOFIORI posted the following photograph on the Biancofiori Facebook Account, which based on the investigation to date, law enforcement believes was directed at personnel assigned to the instant investigation:

47. BIANCOFIORI also told Victim C that if she worked for him, Victim C would be his "top girl," a money maker, and would make "a stack or two" a night, which Victim C understood to mean that she would make $1000 to $2000 per night. Victim C did not agree to work for BIANCOFIORI at that time.

48. In approximately February 2016, Victim C attended a party at a townhouse in Naperville, Illinois, which she understood to be BIANCOFIORI's residence,[24] where she met Victim B, Victim D, and Victim E. BIANCOFIORI told Victim C that if she worked for him, she could take over for Victim D and be his "main girl."

49. Victim C stated that shortly after the party, she began working for BIANCOFIORI. Prior to engaging in commercial sex acts on behalf of



[24] Victim C has since reviewed a known photograph of the Biancofiori Residence and identified it being BIANCOFIORI's residence.

BIANCOFIORI, Victim D took photographs of Victim C at the Biancofiori Residence, which BIANCOFIORI edited, and Victim C also provided Instagram photos from her own account to BIANCOFIORI. Then, shortly after the photos were taken, BIANCOFIORI told Victim C, in front of Victim B and Victim E, that he was posting all three women on Backpage.com. Victim C said that BIANCOFIORI advertised Victim C under the name, "Aisha."

50. I have reviewed the advertisements that were provided by Backpage.com, and these records confirm that on or about February 15, 2016, Victim B, Victim C, and Victim E's semi-nude and suggestive photographs appeared in an online commercial sex advertisement in the Chicago area. These records further confirm that Victim B, Victim C, and Victim E were all posted together in the commercial sex advertisement, and that Victim C was advertise under the name "Aisha." During the investigation, Victim C reviewed a copy of this Backpage.com advertisement, and told law enforcement that BIANCOFIORI posted the advertisement.

51. On that first night of engaging in sex for money, Victim C said she texted Victim D or Victim E "all good" during the appointment, which meant that the appointment was going as planned. According to Victim C, she made about $600 in approximately three hours during her first night of engaging in commercial sex acts on behalf of BIANCOFIORI. According to Victim C, Victim B and Victim E drove her to the appointments, including an appointment with one client at the Red

Roof Inn in DuPage County, Illinois, collected the money she made following the appointments, and then handed over the money to BIANCOFIORI when they returned to the Biancofiori Residence. According to Victim C, BIANCOFIORI told Victim C that she could not get any of the money she earned until BIANCOFIORI knew that she was "official" and "in it."

52. A few days later, BIANCOFIORI picked up Victim C in a silver Cadillac and drove to the Biancofiori Residence.[25] According to Victim C, while there, BIANCOFIORI told Victim C that she was lucky he did not slap her. After Victim C challenged BIANCOFIORI's statement, BIANCOFIORI, with a watch on, slapped Victim C across the face a couple of times in the presence of Victim B, Victim D, and Victim E.[26] BIANCOFIORI's slaps caused a bump on Victim C's head, facial tenderness, and bleeding gums. According to Victim C, after BIANCOFIORI hit her, Victim D told Victim C that Victim C took the beating better than Victim E did on a prior occasion.

53. According to Victim C, later that night, Victim C was posted in an advertisement on Backpage.com for sexual services. According to Victim C, after the

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[25] Other evidence obtained during the course of the investigation corroborates that BIANOCFIORI was associated with a silver Cadillac. More specifically, on or about February 27, 2016, a photograph of the front of a silver XTS Cadillac and five shopping bags filled with what appears to be shoe boxes. In addition, the following text was posted:

> Lavish Habits. #cadillac #xtsplatinum #airjordan #23 #chicago #illstatesfinest #selfmade #selfpaid #lavishhabits #doinshituaint

[26] In a separate statement to law enforcement, Victim B recounted this same physical abuse of Victim C by BIANCOFIORI.

advertisement was posted, clients called requesting Victim C's services. Victim C did not want to engage in commercial sex acts that night, but did so because BIANCOFIORI told her she had to and because she had no transportation, as BIANCOFIORI picked her up earlier that day. According to Victim C, she kept approximately $200 of the proceeds she made that evening and did not immediately inform BIANCOFIORI that she was keeping the money. Following the appointments, Victim C returned to the Biancofiori Residence; Victim C left that next morning and stopped engaging in commercial sex acts for BIANCOFIORI.

54. Later, at law enforcement's direction, Victim C consensually recorded telephone conversations with BIANCOFIORI, who was using telephone number 847-284-XXX ("Biancofiori Phone 1").[27] During the calls, BIANCOFIORI threatened Victim C in part because she purportedly stole $200 from him:

a. On or about February 15, 2016, at approximately 1:47 a.m. CST, Victim C had a text message conversation with BIANCOFIORI, who was using

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[27] Law enforcement believes that BIANCOFIORI is the user of Biancofiori Phone 1 for the following reasons: (1) between approximately May 15, 2015, and at least March 18, 2016, the subscriber information for Biancofiori Phone 1 lists the subscriber name and address as Benjamin Biancofiori, 1913 Golden Gate Lane, Naperville, Illinois, 60563-1457 (i.e., the Biancofiori Residence); (2) according to screenshots of Facebook messages Victim C received from the Biancofiori Facebook Account on or about November 10, 2015, BIANCOFIORI provided Victim C with the telephone number for Biancofiori Phone 1 (*see* paragraph 46, above); (3) according to Victim C, she recognized the male voice heard during these conversations as being that of BIANCOFIORI; and (4) a law enforcement officer familiar with BIANCOFIORI's voice based upon an approximately 50 minute telephone conversation on March 22, 2016, with an individual purporting to be BIANCOFIORI, who was using Biancofiori Phone 1, has reviewed the recordings described above and identified the voice on the recordings as being the same voice as the person with whom he spoke on March 22, 2016, i.e., BIANCOFIORI.

Biancofiori Phone 1. During the conversation, BIANCOFIORI stated, "I promise u dead hoe. Stealing and snitchin means off with ur head. Guaranteed." Later, BIANCOFIORI stated, "Might spare u and just have fam splash acid in ur face. See how far u go then in life. More than one way to kill u b***h."

b. On or about February 16, 2016, at approximately 1:52 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the call, BIANCOFIORI accused Victim C of stealing from him, and threatened violence against her. More specifically, BIANCOFIORI said, "You stole from me b**ch, and threatened to snitch on me." [28] Later, he said, "I'm gonna show you what real killers do."

c. On or about February 16, 2016, at approximately 1:54 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the call, Victim C said, "I worked for you, gave you whatever the f**k you wanted. You made a whole stack [$1000] off my a**." In response, BIANCOFIORI did not deny Victim C working for him, and instead replied, "B***h, a stack? I spent that on t-shirts yesterday at Macy's."[29] During their conversation, BIANCOFIORI continued to threaten Victim C, stating, "When my n****s are burning y'all with hot hangers, and y'all are crying asking for mercy, know I did that s**t, b***h."

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[28] In this Affidavit, I describe various conversations that were consensually recorded or obtained. These descriptions often include my and other agents' understanding of what is being said during such conversations set forth parenthetically. This understanding and interpretation of the conversations is based on (i) the content and context of the conversations, (ii) my and other agents' experiences as law enforcement officers, including our experience observing written conversations as a whole, and (iii) the investigation to date. The summaries of the intercepted conversations set forth in this Application are based on my review of the audio recordings of the conversations and are draft – not final – transcriptions of the conversations. Finally, the summaries contained herein do not include all potentially criminal communications obtained, or all statements or topics covered during the course of the consensually recorded conversations or consensually obtained text message exchanges.

d. On or about February 16, 2016, at approximately 1:59 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. At the beginning of this call, Victim D[30] answered the phone, but BIANCOFIORI ended up talking with Victim C for the remainder of the call. During this conversation, BIANCOFIORI continued to threaten Victim C, stating, "My n**** and his goonies are going to put y'all in the trunk and bring you to me, and I'm going to figure out what to do with y'all." The call ended when BIANCOFIORI stated, "Enjoy what the f*** you've got left, b****, which is nothing really."

e. On or about February 16, 2016, at approximately 2:52 p.m. CST, Victim C had a consensually recorded telephone conversation with BIANCOFIORI, who was using Biancofiori Phone 1. During the conversation, BIANCOFIORI acknowledged that Victim C kept some of her the proceeds she earned by engaging in commercial sex acts and continued to threaten Victim C. More specifically,

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29 On or about February 15, 2016, using the Biancofiori Facebook Account, BIANCOFIORI posted the message, "Bout to go Armani crazy." The posting also provided location information, which reflected that BIANCOFIORI was located at Macy's department store in Oak Brook, Illinois.

30 According to Victim C, Victim C recognized the voice of the female heard on this call as Victim D.

BIANCOFIORI stated, "You might've slicked me over a couple dollars, which is nothing. That s**t is called shrinkage in the business, ok. Everybody steals in every business. That s*** is shrinkage, it's expected. Especially in some s*** you dealing with nothing a** b*****s, you dig. So don't think you slicked me out of s***. Like, it's part of the game." Later, Victim C questioned BIANCOFIORI, stating, "I stole from you what's mine?" Victim C also said, "You can't take what's never yours." In response, BIANCOFIORI said, "It wasn't never mine? You were only steered there . . . [.]" BIANCOFIORI further stated, "I love motherf***ing triggers," and later he said, "I'll take your mother***ing life, ho."

D. Victim D

55. Victim D, born in 1995, has not yet been interviewed by law enforcement officers with regard to this investigation.[31] However, Victim A, Victim B, and Victim C have separately identified Victim D by her real name, photograph, and by the nickname used by Victim D, "Hailey." According to Victim A, Victim D worked for BIANCOFIORI sometime in 2015, but Victim A learned about Victim D through photographs that BIANCOFIORI sent Victim A and through conversations she had with Victim D. Victim B and Victim C stated separately that Victim D worked for BIANCOFIORI as his "main" female, and that Victim D lived with BIANCOFIORI at the Biancofiori Residence.

56. Documents received from Backpage.com during the course of the investigation reflect that Victim D was posted in online commercial sex advertisements in 2015. These advertisements were posted in multiple cities' "adult entertainment, escort" section of Backpage, com, with the user address identified as the Gmail account, including but not limited to the following advertisements:

a. On or about October 23, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

b. Between on or about October 26, 2015, and October 30, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial

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31 On or about May 11, 2016, law enforcement officers approached Victim D in or around the Denver, Colorado area. Victim D was arrested pursuant to an outstanding warrant issued in DuPage County, Illinois. Victim D did not consent to an interview with law enforcement officers at that time.

sex advertisements for the Denver, Colorado, area.

c. Between on or about November 2, 2015, and November 10, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Colorado Springs, Colorado, area.

d. Between on or about November 12, 2015, and November 30, 2015, Victim D's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

57. According to separate statements by Victim B and Victim C, while they worked for BIANCOFIORI from January to March 2016, Victim D took client calls and made appointments for the other women to meet with clients and engage in sex acts for money; according to Victim B, during the time she worked for BIANCOFIORI, Victim D no longer engaged in commercial sex acts on behalf of BIANCOFIORI. Victim B stated that BIANCOFIORI told her that Victim D had been "ran through" too many times, meaning that she had previously engaged in commercial sex acts on too many occasions to be good for the business any longer. In addition to receiving client calls and setting up appointments, according to separate statements by Victim A, Victim B, and Victim C, Victim D took photographs of the women who engaged in commercial sex acts for BIANCOFIORI so that BIANCOFIORI could post the photos in online advertisements. Victim B and Victim C also separately stated that they communicated with Victim D during and after appointments. For example, according to Victim B, she texted Victim D "AG,"

meaning all good, when Victim B received money from the customer, as well as the amount of money received.[32] Similarly, according to Victim C, she at times texted "all good" to Victim D[33] when out on appointments with customers.

58. According to Victim B, she observed BIANCOFIORI beat Victim D numerous times. Victim B stated that BIANCOFIORI beat Victim D approximately 6-7 times per month, and would sometimes beat Victim D severely for a few days in a row, making her face and body bruised and swollen. According to Victim B, BIANCOFIORI would then let Victim D's body heal for a while, and then beat her again. Victim B stated that after BIANCOFIORI beat Victim D, Victim D would not speak but would take calls from clients and arrange appointments. Victim B in part described the following with respect to BIANCOFIORI's physical abuse of Victim D:

a. On one occasion, BIANCOFIORI obtained a new ring that had "MOB" written on it in diamonds, which BIANCOFIORI said stood for "money over bitches."[34] According to Victim B, after BIANCOFIORI obtained the ring, he asked, "Who is the first one that wants to get this imprinted on their face?" A few days later, BIANCOFIORI punched Victim D in the forehead with the MOB ring.

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[32] Law enforcement has consensually review Victim B's telephone and observed text messages on Victim B's phone similar to those described by Victim B here.

[33] Victim C stated that when she texted Victim D, she used the telephone number 331-332-XXXX, which is the same telephone number listed on Backpage.com advertisements featuring Victim C.

[34] On or about February 12, 2016, BIANCOFIORI posted on the Biancofiori Facebook Account, "Should b done next week. Computer stages of my married to the game ring. 4 carat, VS Diamonds. #customonly #1of1 #mob." Then, on or about February 19, 2016, BIANOCFIORI posted on both the Biancofiori Facebook Account and the Biancofiori

b. According to Victim B, BIANCOFIORI sometimes beat Victim D using fingerless boxing gloves that had plastic knuckles, and he sometimes wore particular clothes—black baggy clothes and a hooded shirt with the hood up—when he beat Victim D. Victim B stated that during the beatings, Victim D's blood would gush, and BIANCOFIORI at times screamed at Victim D not to get blood on his floor. After one such beating, Victim B cleaned up a large pool of Victim D's blood that had accumulated on the bathroom floor of the Biancofiori Residence.

c. Victim B stated that she cleaned Victim D's blood off the floor near the downstairs bathroom and kitchen in the Biancofiori Residence on multiple occasions. According to Victim B, BIANCOFIORI kept a bottle of Clorox Bleach spray under the kitchen sink in the Biancofiori Residence with a roll of paper towels next to it, and at some point Victim B was told by other women, including Victim D, to use the bleach spray to clean up the blood. Victim B also said that Victim D used the bleach spray on BIANCOFIORI's boxing gloves in order to remove any of her skin or blood from the gloves.

d. According to Victim B, at times when BIANCOFIORI's minor daughter was at the Biancofiori Residence, BIANCOFIORI took Victim D into the

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Instagram Account, a photograph of a tattooed male hand wearing a ring with the letters "MOB" appearing to be spelled out in diamonds. Separately, Victim C told law enforcement that BIANCOFIORI showed Victim C a photograph of the "MOB" ring while they were at the Biancofiori Residence, and that Victim C subsequently observed a photograph of the ring on Biancofiori's Instagram Account. Victim C stated that she recognized the hand depicted in the photogram as BIANCOFIORI's hand because tattoos BIANCOFIORI has on his hands are found in the picture. Finally, on or about March 20, 2016, a photograph of BIANCOFIORI's tattooed hand wearing a diamond bracelet, the diamond "MOB" ring, and a belt bearing the Gucci-brand insignia, was posted on the Biancofiori Facebook Account.

garage to beat her. On other occasions when BIANCOFIORI's minor daughter was at the Biancofiori Residence, BIANOCOFIORI drove with Victim D away from the residence and then beat her. According to Victim B, she observed Victim D shaking and upset immediately following these beatings.

e. According to Victim B, BIANCOFIORI treated Victim D like a prisoner. At times BIANCOFIORI required Victim D to shower with the bathroom door open, and he ordered others to watch Victim D when he left the house. BIANCOFIORI often told Victim D, in Victim B's presence, that he was not going to kill Victim D, but that he would give her "the treatment," which Victim B understood meant treating Victim D so badly that BIANCOFIORI would make Victim D want to kill herself. According to Victim B, she once asked BIANCOFIORI about obtaining pain medication for Victim D following a beating. BIANCOFIORI denied Victim B's request.

E. Victim E

59. Victim E, born in 1994, was interviewed by law enforcement officers on or about May 11, 2016. In summary, Victim E admitted that she engaged in commercial sex acts for BIANCOFIORI since approximately January 2016. She denied that BIANCOFIORI used force against her or anyone else, and she denied that he forced her to do anything against her will. She stated that she gave BIANCOFIORI all of the proceeds earned by engaging in commercial sex acts, but that BIANCOFIORI would pay her car and phone bill and provide her with food.

60. Additionally, Victim B and Victim C have separately identified Victim E by her real name, photograph, and by her working name, "Brittany." According to Victim B and Victim C, Victim E engaged in commercial sex acts on behalf of BIANCOFIORI during the same time that both Victim B and Victim C engaged in sex for money on behalf of BIANCOFIORI. According to separate statements by Victim B and Victim C, Victim E went on outcalls to see clients after the appointments were arranged by Victim D. Victim B and Victim C also separately stated that after the appointments, Victim E provided any money she earned by engaging in commercial sex acts to BIANCOFIORI.

61. I have reviewed the Backpage.com advertisements that were produced by Backpage.com and linked to the Gmail account, and also reviewed Backpage.com advertisements posted online within the past several days. Victim E appears in several online commercial sex advertisements, including, but not limited to, the following advertisements:

a. Between on or about December 1, 2015, and March 15, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Chicago area.

b. On or about February 15, 2016, Victim B, Victim C, and Victim E's semi-nude and suggestive photographs appeared in an online commercial sex advertisement for the Chicago area.

c. On or about April 2, 2016, and April 6, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Phoenix, Arizona, area.

d. Between on or about March 21, 2016, and May 10, 2016, Victim E's semi-nude and suggestive photographs appeared in online commercial sex advertisements for the Denver, Colorado, area.[35]

62. According to Victim B, she observed BIANCOFIORI physically abuse Victim E. Victim B stated that on one occasion, BIANCOFIORI punched Victim E in her ear, which had been recently pierced. According to Victim B, Victim E's ear subsequently became infected. Also, Victim B saw BIANCOFIORI slap Victim E, purportedly because Victim E had been "mouthy."

63. According to Victim C, after BIANCOFIORI hit Victim C in the head and face, which was witnessed by Victim B, Victim D, and Victim E, Victim D told Victim C about a time that BIANCOFIORI hit Victim E. Victim D told Victim C that she took the beating better than Victim E took the beating. Victim D told Victim C that after BIANCOFIORI beat Victim E, Victim E cried in the corner.

[35] These online commercial sex advertisements in the Denver, Colorado area used the telephone number 720-361-XXXX.

III. The Seized Devices

A. The Subject Devices Seized from the Biancofiori Apartment

64. On or about May 11, 2016, pursuant to an arrest warrant issued by Magistrate Judge Jeffrey T. Gilbert in the Northern District of Illinois, BIANCOFIORI was arrested and taken into custody near the apartment located in the Solana Cherry Creek Luxury Apartment Complex, more specifically near 801 S. Cherry Street, Apartment 435, Glendale, Colorado 80246 (the "Biancofiori Apartment").[36] In addition, on that same day, Magistrate Judge Kristen L. Mix of the District of Colorado issued a search warrant authorizing the search of the Biancofiori Apartment. Law enforcement executed the Biancofiori Apartment search warrant on May 11, 2016.

65. During the execution of the warrant, law enforcement officers recovered items consistent with the commercial sex industry, including among other items a bag containing condoms and feminine wipes, men's jewelry, including the "MOB" ring (*see* footnote 34), and the **Subject Devices**. Further, law enforcement officers confirmed that Victim D and Victim E were with BIANCOFIORI at the Biancofiori Apartment. To date, the only known inhabitants of the Biancofiori

[36] Following his arrest, BIANCOFIORI was advised of his *Miranda* rights and agreed to waive those rights and speak to law enforcement officers. During the interview, BIANCOFIORI denied any involvement in commercial sex trafficking, and he denied receiving any proceeds of any commercial sex acts. BIANCOFIORI stated that he has never hit or been physically abusive toward any woman. Further, BIANCOFIORI denied any involvement in posting any women for escort or commercial-sex services on Backpage.com, and he indicated that he had only a general familiarity with Backpage.com. BIANCOFIORI stated that he uses a Facebook account and an Instagram account.

Apartment at or around the time of the execution of the search warrant are BIANCOFIORI, Victim D, and Victim E.

66. Based on my training and experience investigating crimes related to sex trafficking by force, fraud, or coercion, as well as the information that I have learned to date during the course of this investigation, I believe that each of the electronic devices seized during the search of the Biancofiori Apartment may contain evidence related to BIANCOFIORI's sex trafficking, including his trafficking of Victim D and Victim E. *See also* Paragraphs 6-14, above.

67. Specifically, the **Subject Devices** include five cell phones, including four iPhones and one ZTE cell phone (**Subject Devices 1, 15, 16, 17,** and **19**). Based upon the investigation to date, I know that BIANCOFIORI, Victim D, and Victim E all use cellular telephones, and electronic devices to communicate with one another, and with customers of BIANCOFIORI's commercial sex business. In addition, based upon my training and experience, including in investigating sex trafficking operations, I know that cellphones can be used to store documents, records, photographs and other items related to sex trafficking. That is particularly true where, as here, the sex trafficking organization operates mainly online, namely, through the posting of photographs and advertisements on Backpage.com. Based on my training and experience, sex traffickers keep photographs, advertisements and contact information stored for future use, and cellular telephones, tablets, and computers are common places to store such information.

Thus, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on **Subject Device 1, Subject Device 15, Subject Device 16, Subject Device 17,** and **Subject Device 19**.

68. Further, the **Subject Devices** include seven SIM cards (**Subject Devices 5-11**). As explained in the preceding paragraph, and based on my training and experience, I know that SIM cards store information from cellular telephones, including contact list data and SMS messages. During this investigation, I have learned that BIANCOFIORI, along with Victim D and Victim E, used cellular phones to operate BIANCOFIORI's sex trafficking business. Specifically, cellular phones were used to correspond with potential clients and to arrange appointments with Victim B, Victim C, and Victim E, and the women who engaged in commercial sex acts would often text BIANCOFIORI or Victim D after an appointment ended with information regarding the amount of money earned at the appointment. Accordingly, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on **Subject Device 5, Subject Device 6, Subject Device 7, Subject Device 8, Subject Device 9, Subject Device 10,** and **Subject Device 11**.

69. Additionally, three electronic tablets, including two iPads and a Samsung LG tablet, were recovered during the search of the Biancofiori Apartment (**Subject Devices 3, 4,** and **18**). As explained above, and based on my training and experience, I know that tablets are capable of accessing the internet and I know

that sex traffickers often use the internet to further their business. This is especially true in this case, where information learned to date indicates that BIANCOFIORI advertised the services of his victims in online ads on sites like Backpage.com. I know from training and experience that tablets can store information related to internet traffic, browsing history, cookies, and other information related to the use of the internet. Further, based on my training and experience, I know that sex traffickers (and as set forth in detail herein, BIANCOFIORI) often use email, Facebook, or other social media sites to engage potential victims or customers, and I know that search of tablets may uncover information related to the use of these services and sites. Specific to this case and by way of example only, Victim C explained that she first met BIANCOFIORI on Facebook, and as set forth herein, BIANCOFIORI is a regular user of social media sites. Accordingly, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on **Subject Device 3, Subject Device 4,** and **Subject Device 18**.

70. Additionally, two flash drives (**Subject Devices 13** and **14**), were seized from the Biancofiori Apartment. As explained above, and based on my training and experience, I know that flash drives can be used to store a variety of information that is stored on a computer, camera, phone, or other electronic device, including, but not limited to, photographs, contact information, financial records, and back-up or transfer of other computer files. I know that sex traffickers often

use storage devices, like flash drives, to keep information that is relevant to their sex trafficking business accessible to them and stored for long periods of time. Accordingly, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on **Subject Device 13** and **Subject Device 14**.

71. Finally, an external hard drive and a MacBook Pro computer were seized from the Biancofiori Apartment (**Subject Devices 2** and **12**). As stated above, and based on training and experience, sex traffickers often use a computer to facilitate their illegal sex trafficking business. Sex traffickers can store information related to their customers, their victims, and their business operation on computers or hard drives, including information like photographs of the victims, advertisements placed online, accounting of financial transactions related to the business, contact information for customers, receipts from hotels or other places used to facilitate the crime, and other records, documents, or evidence related to sex trafficking. This is especially true here, where information received to date indicates that BIANCOFIORI used the internet to advertise commercial sex services, and that he traveled to multiple states in which he would need the stored information to operate his business, rented apartments, rented hotel rooms, and engaged in other financial transactions in support of his illegal business. Accordingly, I believe that evidence of BIANCOFIORI's sex trafficking operation, in

violation of 18 U.S.C. § 1591(a), will be found on **Subject Device 2** and **Subject Device 12**.

72. Each of the **Subject Devices** was seized in Colorado, stored by the FBI in Colorado, shipped to the FBI in Chicago at 2111 West Roosevelt Road and subsequently shipped to the FBI office in Lisle at 4343 Commerce Court, Suite 600. Each of these **Subject Devices** were stored in Colorado, transported to Chicago, stored in Chicago, transported to Lisle, and stored in Lisle in a manner in which the contents are, in my experience, and to the extent material to this investigation, in substantially the same condition as they were when the devices first came into the possession of the FBI.

B. **The Subject Phone**

73. On or about May 11, 2016, a Magistrate Judge in this Court issued a warrant for the arrest of BIANCOFIORI. On the same date, on or around May 11, 2016, BIANCOFIORI was arrested in or around the Denver, Colorado area. At the time of his arrest, BIANCOFIORI had on his person several items, including approximately $4169 in currency and an iPhone 6 (the **Subject Phone**).

74. As explained above, and based on my training and experience, I believe that evidence of BIANCOFIORI's sex trafficking business, in violation of 18 U.S.C. § 1591(a), will be found on the **Subject Phone**. Specifically, I know that sex traffickers often store contact information for victims and customers related to their sex trafficking business in their cell phones. Further, cell phones are likely to

contain photographs, web browsing history, text messages, emails, and other correspondence related to the business of sex trafficking. Additionally, cell phones contain information regarding location and previous itineraries, and information related to financial information included bank records or receipts, each of which may relate the business of sex trafficking. This is especially true here where the investigation to date indicates that BIANCOFIORI traveled in different states to traffic women in the commercial sex industry, and used his cell phone in furtherance of this business.

C. The Subject iPod

75. On or about May 18, 2016, a Magistrate Judge in this District issued a seizure warrant for a 2013 Cadillac XTS, which was used by BIANCOFIORI and stored at a dealership in or around the Denver, Colorado area. When federal law enforcement officers executed the seizure warrant of the Cadillac, and performed an inventory search of the contents of the vehicle, they discovered an iPod inside of the vehicle (the **Subject iPod**).

76. Based upon my training and experience, and as described above, I know that sex traffickers often store evidence related to their sex trafficking business on electronic devices, including, but not limited to, contact information for victims and clients, photographs of victims, information related to appointment schedules, and information related to the financial dealings of the business including accounting of profits, receipts, and other ledgers. I also know based on my

training and experience that this type of information can, and often is, stored on an iPod, and that iPods are capable of accessing the internet and may contain information related to web browsing, and other internet-related activity. Accordingly, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on the **Subject iPod**.

D. The Subject Camera

77. As described above, according to information provided by Victim B and Victim C, beginning no later than January 2016 and continuing until at least approximately mid-March 2016, BIANCOFIORI and Victim D resided at the Biancofiori Residence. In addition, Victim B and Victim C told law enforcement that Victim D and/or Victim E took photographs of each of them in early 2016 for posting on Backpage.com at the Biancofiori Residence.

78. On or about March 25, 2016, after receiving consent from the City of Naperville, law enforcement installed a pole camera in the vicinity of the Biancofiori Residence, with a view of the Biancofiori Residence. Law enforcement officers have reviewed portions of the video footage from the pole camera, including segments of the footage between approximately March 25, 2016 and May 10, 2016.[37] The review of the footage from approximately March 25, 2016 until April 10, 2016,

[37] The camera appears to zoom in on the Biancofiori Residence at night, when it appears lighting is limited, and thus the view of the pole camera is more restricted.

revealed no activity at the Biancofiori Residence.[38] On or about April 11, 2016, an associate of BIANCOFIORI, Individual F, and an unidentified female entered the Biancofiori Residence with shopping bags, and subsequently exited the Biancofiori Residence without the shopping bags. From approximately April 12, 2016, through approximately May 3, 2016, the review of the footage revealed no activity at the Biancofiori Residence. Following May 3, 2016, law enforcement observed some activity on the footage review. First, on or about May 4, 2016, multiple individuals appear to enter and exit the Biancofiori Residence, including Individual F, two minor individuals accompanying Individual F, a man who appeared to be a neighbor, and an alarm company representative. Other than shelving and what appeared to be cleaning supplies, which were removed by the neighbor, no items appear to have been removed from the Biancofiori Residence by those individuals. Second, on or about May 7, 2016, May 8, 2016, and May 9, 2016, Individual F entered the Biancofiori Residence, sometimes accompanied by an unknown female. Other than small personal bags, such as a purse and small bag, Individual F and the unknown female did not appear to carry anything outside of the Biancofiori Residence.

38 The camera angle between approximately March 25, 2016 and March 31, 2016, was positioned with a view higher up on the Biancofiori Residence, and thus presented a more restricted view of the Biancofiori Residence.

79. On or about May 11, 2016, pursuant to an application by the government and an order out of this District, a search warrant was executed at the Biancofiori Residence.

80. During the course of that search, law enforcement officers recovered the **Subject Camera**, further described in Attachment A.

81. Based upon my training and experience, I know that persons engaged in commercial sex trafficking often take digital photographs of the women who engage in commercial sex on their behalf and that these persons then post the photographs to sites like Backpage.com, to advertise the services of those women. Further, I know that digital cameras often contain internal storage that can hold a significant number of photographs or videos. In this case, and as set forth in detail throughout, BIANCOFIORI regularly photographed his victims in order to place ads for their services on Backpage. Thus, I believe that evidence of BIANCOFIORI's sex trafficking operation, in violation of 18 U.S.C. § 1591(a), will be found on the **Subject Devices**.

SPECIFICS REGARDING SEARCHES OF COMPUTER SYSTEMS

82. Based upon my training and experience, and the training and experience of specially trained computer personnel whom I have consulted, searches of evidence from computers commonly require agents to download or copy information from the computers and their components, or remove most or all computer items (computer hardware, computer software, and computer-related

documentation) to be processed later by a qualified computer expert in a laboratory or other controlled environment. This is almost always true because of the following:

a. Computer storage devices can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take days or weeks, depending on the volume of data stored, and it would be generally impossible to accomplish this kind of data search on site.

b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of a computer system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (which may be caused by malicious code or normal activities of an operating system), the controlled environment of a laboratory is essential to its complete and accurate analysis.

83. In order to fully retrieve data from a computer system, the analyst needs all storage media as well as the computer. The analyst needs all the system software (operating systems or interfaces, and hardware drivers) and any applications software which may have been used to create the data (whether stored on hard disk drives or on external media).

84. In addition, a computer, its storage devices, peripherals, and Internet connection interface may be instrumentalities of the crime(s) and are subject to seizure as such if they contain contraband or were used to carry out criminal activity.

PROCEDURES TO BE FOLLOWED IN SEARCHING ELECTRONIC STORAGE MEDIA

85. Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol.

86. The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B;

d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

87. The government will return any electronic storage media removed from the premises described in Attachment A within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

CONCLUSION

88. Based on the above information, I respectfully submit that there is probable cause to believe that BIANCOFIORI has engaged in the sex trafficking of Victim A, Victim B, Victim C, Victim D, and Victim E, and others known and unknown, by force, fraud, and coercion, in violation of 18 U.S.C. § 1591(a), and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Devices**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Devices**, more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

89. I, Helen Dunn, being duly sworn, depose and states under penalty of perjury that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information, and belief.

HELEN DUNN
Special Agent, Federal Bureau of Investigation

Subscribed and sworn
before me this 7th day of June, 2016

Honorable SIDNEY SCHENKIER
United States Magistrate Judge

ATTACHMENT A
DESCRIPTION OF ITEMS TO BE SEARCHED

One pink iPhone S, Model a1687, FCC ID: BCG-E2944A and IC: 579C-E2944A, with the home screen bearing a photograph of Victim D and BIANCOIFIORI, seized from the kitchen counter of the Biancofiori Apartment, and stored at the FBI Office at 4343 Commerce Court, Suite 600, Lisle, Illinois and logged into evidence as 1B58.

ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED AND SEARCHED

Evidence, instrumentalities, and contraband concerning violation of Title 18, United States Code, Section 1591, as follows:

The assigned telephone number of the cellular phone or identifying information about the device (ESN, MIN, IMSI, or IMEI)

The electronically stored phone book or contact list.

The call log to include the record of incoming, outgoing, and missed calls.

All voice messages recorded on the device as these voicemails pertain to the identity of the device owner/user, the identity of known and unknown victims and co-conspirators, and discussions pertaining to sex trafficking.

All sent, received, and composed text messages as these text messages pertain to the identity of the device owner/user, the identity of known and unknown victims and coconspirators, and discussions pertaining sex trafficking.

All sent, received, and composed and email messages as these emails pertain to the identity of the device owner/user, the identity of known and unknown victims and coconspirators, and discussions pertaining to sex trafficking.

All GPS information stored on the device and any information, to include cell site information or metadata, which would indicate the device's location.

Social media applications present on the device, including but not limited to Instagram and Facebook, as these applications may contain GPS and location information indicating where the phone has been used; photographs and/or videos showing the identity of the device owner/user, the identity of known and unknown victim and coconspirators, and discussions pertaining to sex trafficking.

Documents or records concerning the identity of the owner/user of the device, the identity the identity of known and unknown victims and co-conspirators, and discussions pertaining to sex trafficking.

Documents or records concerning the occupancy of the residence located at 801 S. Cherry Street, Glendale, Colorado, 80246, such as utility and telephone bills or addressed correspondence.

Documents that concern any accounts with an Internet Service Provider, which contain or may lead to evidence of violations of Title 18, United States Code, Section 1591(a).

Items relating to advertisements, including but not limited to advertisements on Backpage.com or other online advertising websites, documents or records from online advertising websites, and photographs associated with advertisements.

Items relating to interstate travel for the purpose of engaging in sex trafficking, including receipts, tickets, and photographs.

Items relating to Biancofiori's sex trafficking business, including but not limited to contact information for employees/clients, information concerning housing, hotels rentals, vehicle records, and items purchased for the business.

Items or records referencing or appearing to depict Biancofiori, Individual A, Individual B, Individual C, Individual D, Individual E, Victim A, Victim B, Victim C, Victim D, Victim E, or other currently known or unknown victims, including but not limited to photographs or video footage.

Items relating to the receipt, expenditure, concealment, or other disposition of income derived from sex trafficking, including records, receipts, notes, ledgers, money orders, or wire transfer or money remittance records.

Items relating to internet history, websites visited, and internet searches as these searches pertain to the identity of the device owner/user, the identity of known and unknown victims and coconspirators, and searches pertaining to sex trafficking.

ADDENDUM TO ATTACHMENT B

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B; and

d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

The government will return any electronic storage media removed from the premises described in Attachment A within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

AO 93 (Rev. 11/13) Search and Seizure Warrant

AUSA Abigail Peluso (312) 353-5342
AUSA Erika Csicsila, (312) 353-5370

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

The Pink iPhone S, Model a1687, FCC ID: BCG-E2944A and IC: 579C-E2944A more fully described in Attachment A, attached hereto.

Case Number: 16M301

SEARCH AND SEIZURE WARRANT

To: Special Agent Helen Dunn and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before June 21, 2016 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

Date and time issued: June 7, 2016 2:42 PM.

Judge's signature

City and State: Chicago, Illinois

SIDNEY SCHENKIER, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No:	Date and Time Warrant Executed:	Copy of Warrant and Inventory Left With:
Inventory made in the presence of:		
Inventory of the property taken and name of any person(s) seized:		

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: ____________________

____
Executing officer's signature

____
Printed name and title

ATTACHMENT A
DESCRIPTION OF ITEMS TO BE SEARCHED

One pink iPhone S, Model a1687, FCC ID: BCG-E2944A and IC: 579C-E2944A, with the home screen bearing a photograph of Victim D and BIANCOIFIORI, seized from the kitchen counter of the Biancofiori Apartment, and stored at the FBI Office at 4343 Commerce Court, Suite 600, Lisle, Illinois and logged into evidence as 1B58.

ATTACHMENT B

DESCRIPTION OF ITEMS TO BE SEIZED AND SEARCHED

Evidence, instrumentalities, and contraband concerning violation of Title 18, United States Code, Section 1591, as follows:

The assigned telephone number of the cellular phone or identifying information about the device (ESN, MIN, IMSI, or IMEI)

The electronically stored phone book or contact list.

The call log to include the record of incoming, outgoing, and missed calls.

All voice messages recorded on the device as these voicemails pertain to the identity of the device owner/user, the identity of known and unknown victims and co-conspirators, and discussions pertaining to sex trafficking.

All sent, received, and composed text messages as these text messages pertain to the identity of the device owner/user, the identity of known and unknown victims and coconspirators, and discussions pertaining sex trafficking.

All sent, received, and composed and email messages as these emails pertain to the identity of the device owner/user, the identity of known and unknown victims and coconspirators, and discussions pertaining to sex trafficking.

All GPS information stored on the device and any information, to include cell site information or metadata, which would indicate the device's location.

Social media applications present on the device, including but not limited to Instagram and Facebook, as these applications may contain GPS and location information indicating where the phone has been used; photographs and/or videos showing the identity of the device owner/user, the identity of known and unknown victim and coconspirators, and discussions pertaining to sex trafficking.

Documents or records concerning the identity of the owner/user of the device, the identity the identity of known and unknown victims and co-conspirators, and discussions pertaining to sex trafficking.

Documents or records concerning the occupancy of the residence located at 801 S. Cherry Street, Glendale, Colorado, 80246, such as utility and telephone bills or addressed correspondence.

Documents that concern any accounts with an Internet Service Provider, which contain or may lead to evidence of violations of Title 18, United States Code, Section 1591(a).

Items relating to advertisements, including but not limited to advertisements on Backpage.com or other online advertising websites, documents or records from online advertising websites, and photographs associated with advertisements.

Items relating to interstate travel for the purpose of engaging in sex trafficking, including receipts, tickets, and photographs.

Items relating to Biancofiori's sex trafficking business, including but not limited to contact information for employees/clients, information concerning housing, hotels rentals, vehicle records, and items purchased for the business.

Items or records referencing or appearing to depict Biancofiori, Individual A, Individual B, Individual C, Individual D, Individual E, Victim A, Victim B, Victim C, Victim D, Victim E, or other currently known or unknown victims, including but not limited to photographs or video footage.

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c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B; and

d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

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